



State of Utah

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**Department of
Workforce Services**

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To: Greg Paras
Roy Employment Center Manager

From: James Whitaker
Director, Operations Support Division

Date: August 21, 2005

Re: Management Evaluation Initial Report, Roy Employment Center

During the week of July 18th, a Management Evaluation was conducted of the Roy Employment Center. The evaluation was accomplished through off-site statistical assessment and case review as well as an on-site visit. The review activities covered the areas of Program Access, Assessment of Corrective Action, Recipient Claims, Civil Rights, and use of the 15% ABAWD Exemption. The review team consisted of Loggins Merrill, Sherri Kirk, Darren Sheffer, Jennifer Meyer-Smart and Gary Kimber.

This report is based on compiled information gathered from reports, statistical data and case reviews, as well as findings presented and discussed with staff at the exit conference. Other information that was used to help complete the review consisted of interview questions with management, front-line staff, community partners and targeted case reviews. Specific reports used in this evaluation included:

- YODA Food Stamp Program Timeliness Report
- Food Stamp Quality Control Report
- Quality Control Report on Negative Cases
- Overpayment Calculation Referral Timeliness Report
- State Corrective Action Plan (CAP) for FY05
- Negative Denied/Closed Case Ad-Hoc Report
- YODA Intake Work Processed – Initial and Denied Case Report
- Food Stamp Program Participation Report

Associated with the findings identified in this report are either required actions or recommendations. Both required actions and recommendations must be addressed either by actions taken to correct the issue or the rationale for disagreement with the finding. The actions taken to correct the findings need to be measurable with supporting documentation to demonstrate results. The actions must also be time-bound in order to ensure timely correction and to facilitate required follow up activities.

Within 30 days of receiving this report, each responsible party identified with the associated finding must submit a response. The findings will be documented on a Corrective Action Request (CAR) form and will include any required or recommended actions. The form should be completed and returned to the lead auditor, Darren Sheffer, for inclusion in the response report.

Ensure each CAR provides sufficient detail regarding any action taken to correct the deficiency identified for each finding. For findings where corrective action has not yet occurred or is not complete, the CAR should identify the anticipated completion time for the corrective action. The lead auditor will schedule a follow-up review within 90 days following the final Employment Center response regarding any required actions or recommendations.

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Roy Employment Center North Region

July 2005

Utah Department of Workforce Services
Program Performance Team

Food Stamp Management Evaluation
Conducted in behalf of

United States Department of Agriculture
Food and Nutrition Service Headquarters

1. Program Access

Evaluation activities:

To determine if access to the Food Stamp program is being adequately provided, the team reviewed the access areas of office pathway, timeliness of issuance, negative errors, and outreach activities to determine if there were any barriers to customers accessing the Food Stamp program. The results are listed below.

Office Pathway:

An Employment Center (EC) “walkthrough” was conducted to review the process a typical customer would encounter when applying for Food Stamp benefits. The purpose is to observe program signage and resource information and the steps required for customers to navigate the application process. Customers enter the EC and are able to walk to two different desks. One desk is run by a full-time Information Specialist (IS) and the second desk is run by an office technician. Their needs are then assessed, if applying for benefits, the office technician will provide an application and then refer them to the IS desk. The IS will screen the application to determine if the customer needs to meet with an employment counselor. If the IS determines if the customer is not required to meet with an employment counselor, they will take the application directly to the eligibility specialist. The customer will receive their Horizon Card at the conclusion of the intake interview. No changes are made to the pathway for dropped off or mailed-in applications. The IS screens the applications and assigns these applications using a rotation schedule for eligibility workers. Drop off applications are scheduled phone interviews and mail applications are contacted by phone the same day that they are received. The customer is advised to come to the EC to obtain their Horizon Card if they do not already have one. The eligibility worker will also obtain identity verification.

Results:

- All applicable signage was posted in the lobby area.
- Food Stamp applications were available in the lobby as well as Food Stamp brochures in both English and Spanish.
- Food Stamp applications were handed out with the Rights and Responsibilities form as well as the Eagle V Angus card.

Finding:

1. The Spanish Food Stamp application used by the EC was an outdated version. The latest version date is May 2004 and the version found in use was January 2004. Also, the current Eagle V Angus card in Spanish is 02-28S-0603, however the EC is using version 02-28S-1202.
2. The current Spanish Food Stamp Application available was over a year behind the current English Food Stamp application.

3. The Rights and Responsibilities form used by the EC was outdated. Version 02-22-0502 was in circulation but the current version is 02-22-0304.

Required Action:

1. Purge outdated Spanish Food Stamp applications and Eagle V Angus Food Stamp cards and replace with current versions.

Recommendations:

1. (OSD) Update the translation of the Food Stamp application into Spanish to match with the current English Food Stamp application version.
2. Purge outdated Rights and Responsibilities form 02-22-0502 and replace with the latest version available on the intranet (currently 02-22-0304).

Timeliness Of Issuance:

Timely issuance of benefits is not only a requirement for the program but also an indicator of efforts by the EC to provide access and customer service with timely actions. The goal for the state is 95% for both expedited and regular issuance. The current timeliness rates from YODA are reviewed for the past six months. Case edits were also conducted on 25 recent applications to determine if appropriate action were taken to determine eligibility and proper issuance timeframes.

Results:

- The current cumulative rates for the timeframe December 04 through May 05 were 97.18% for expedited and 97.16% for regular issuance.
- There were no untimely issuances noted in the case edit results. CAAL narratives overall provided good detail about the case actions.

Finding:

1. Not all verifications are being date stamped.

Recommendation:

1. Review pathway and make sure all verifications are date stamped to correctly identify the date provided.

Negative Errors:

Negative case errors result from actions taken or, in some cases, not taken by workers that determine the case ineligible for benefits where the customer actually qualifies. This situation may be the result of incorrect application of policy or insufficient information to support the denial or reason.

Several resources were examined to provide the basis for analysis of status and trends for the Roy EC, including QC reports, supervisory edit data and additional case edits. Case edits were completed on 25 denied applications and 25 closed cases from May and June 05 and recently approved cases from June 05.

Results:

- QC data for the time period FY2004 through February of 2005 indicate a negative error rate of 83.9% (31 cases sampled, 5 errors). It was noted that the EC has completed a 100 % case correction in the area of categorically eligible as 4 of the 5 errors received were categorically eligible errors.

Outreach Activities:

Outreach activities were reviewed using the DWS Food Stamp Outreach Strategy. Five community partners were interviewed. The purpose is to assess the relationship with local agencies, their knowledge about the Food Stamp program and the pathway for sharing services for common customers.

Results:

- The Roy EC is in close proximity to the Ogden EC and the Clearfield EC. This may result in some feedback to not only the Roy EC, but to the North Region in general.
- Five partners with connections to the Roy EC were interviewed during the ME. Positive feedback was received from all five regarding their understanding of the Food Stamp program and the coordination efforts between their agencies.
- All community partners were interested in receiving outreach materials from the Roy EC.
- The Davis County Food Bank requested Spanish brochures.
- The Catholic Community Services requested that the Roy EC attend one of their staff meetings and give an overview training of the Food Stamp program and other services provided by our agency.

2. Assessment of Corrective Action

Evaluation activities:

The State's Corrective Action Plan includes initiatives to address the areas of timeliness and negative errors. The North Region has a specific timeliness plan with the goal and objectives of reaching and maintaining the 95% timelines rate for benefit issuance.

The management evaluation included reviews of Yoda timeliness reports, supervisory edit data and staff interviews to determine CAP compliance and effectiveness.

Results:

- The Supervisory Edit Database was reviewed and from 7/1/04 to 6/24/05, 114 negative edits had been completed with 92 without errors. Tracking of the negative error rate is accomplished through the DWS Quality Control data.
- Staff interviews indicate a strong awareness of the timeliness standards. Staff utilize a weekly timeliness report that is pulled each week which reflects in their timeliness rates.

3. Recipient Claims Management

Evaluation activities:

The most recent completed quarter of overpayment referrals were reviewed to determine if they reflected the requirements of the Recipient Claims training pertaining to the quality of the referrals. The Employment Center staff and payment specialist were also interviewed.

Results:

- Results from the Overpayment report for the period January – March 05 indicate there were 8 out of 37 referrals which were cancelled and non-obligated. The two main areas of confusion were related to Lack of Evidence and 10-10-10 policy. This was also reflected in the interview with the Overpayment Specialist. Staff interviews indicate an awareness and understanding of the overpayment process and the information needed to support the overpayment claims.
- The overpayment report still reflects untimely issuance of the NAA notices. The PEP unit is conducting a pilot program to address this issue directly. There is no action required by the EC specific to the timeliness issue.

Finding:

1. 22% of the referrals reviewed were cancelled and non-obligated.

Required Action:

1. Policy states, “When there is not enough evidence to support an overpayment calculation referral, make an investigation referral. (See procedure Investigation Referral – Identifying Appropriate Calculation Referral).” Refer quality referrals with appropriate evidence and comply with 10-10-10 policy.

4. Civil Rights Compliance

Evaluation activities:

The Civil Rights Act requires states and agencies to establish a public notification system to inform applicants and participants of their rights and responsibilities, the policy of nondiscrimination and the procedure for filing a complaint.

The ME reviews the EC signage and forms for required non-discrimination statements, evidence of training and the complaint process. Staff interviews were conducted to assess awareness of and the process for, handling complaints of discrimination.

Results:

- All required posters were displayed in the EC.
- The EC received ethics training within the last year. Staff interviews indicated knowledge of the Civil Rights requirements.
- Staff were generally knowledgeable of the process to refer a discrimination complaint including the proper forms to complete and where to send the form. There was mention of attempts to mediate complaints, if possible, at the EC level. Trying to mediate a general complaint is an acceptable practice, but once the complaint is identified as a violation of a protected class, staff must follow the discrimination complaint process to direct those complaints to the department's Equal Opportunity Officer.

5. Use of 15% of ABAWD Exemptions

Evaluation activities:

Staff were interviewed to determine their understanding of this exemption. An ad hoc report was also pulled for the Roy Employment Center to see if this exemption was being used.

Results:

- An MIS adhoc report was created for the Roy EC that indicates some usage of the ABAWD exemption.
- Most staff indicated awareness about the exemption criteria but seemed tentative to utilize it. Management interviews indicated a renewed emphasis has been placed on use of this option with an increase of use in the past 9 months.

Finding:

1. The 15% exemption needs to be utilized to assist customers when appropriate.

Recommendation:

1. Encourage staff to consider/utilize the exemption when appropriate.

Attachment A

Roy Timeliness December 2004 to May 2005 with Average

